

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MINTEL INTERNATIONAL GROUP,)
LTD., a United Kingdom corporation,)
Plaintiff,) Case No.: 08-cv-3939
v.) Judge Robert Dow, Jr.
MEESHAM NEERGHEEN, an individual,)
Defendant.)

)

AGREED MOTION FOR EXTENSION OF TIME

NOW COMES defendant Meesham Neergheen (“Neergheen”), by and through his undersigned counsel, and as agreed to by Plaintiff Mintel International Group, Ltd. (“Mintel”) hereby moves this Honorable Court for a seven (7) day extension of time to answer or otherwise plead to the Complaint in this action.¹ Presently, Neergheen’s answer or other pleading in response to the Complaint is due to be filed on or before July 31, 2008. By way of this motion, Neergheen are seeking until August 11, 2008 to answer or otherwise plead.

The extension of time sought by this motion is not for purposes of delay, but rather to allow Neergheen to fully and completely consider the allegations of the Complaint and to formulate his positions thereto. Such is particularly necessary in light of the expedited discovery currently taking place in this matter.

¹ Additionally, the parties agree that the deadline for Plaintiff's response to Defendant's First Set Requests for Admission shall be extended seven (7) days to August 15, 2008.

Undersigned counsel has discussed this motion via telephone and e-mail on July 29, 2008 with Ms. Katherine Pronk, one of the counsel for Mintel, and counsel indicated that Mintel has no objection to the extension of time sought by Neergheen by this motion.

WHEREFORE, Meesham Neergheen respectfully solicits the entry of an order in accordance with the prayer of this motion.

Dated: July 29, 2008

Respectfully submitted,

By: /s/ Jeana R. Lervick
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Jeana R. Lervick
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of **Agreed Motion for Extension of Deadlines and Notice of Motion** has been served this 29th day of July, 2008 via ECF filing to:

Joseph Marconi
Victor Pioli
Katherine J. Pronk
JOHNSON & BELL, LTD.
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/s/ Jeana R. Lervick

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